

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

Attorneys at Law

10 Madison Avenue, Suite 400  
Morristown, NJ 07960  
Telephone: 973-656-1600  
Facsimile: 973-656-1611  
[www.ogletree.com](http://www.ogletree.com)



Michael Nacchio  
[Michael.Nacchio@ogletreedeakins.com](mailto:Michael.Nacchio@ogletreedeakins.com)

April 22, 2021

**Via ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

***Re: HC2, Inc. v. Andrew Delaney***  
***Civil Action No. 20-cv-03178-LJL***

Dear Judge Liman:

On behalf of HC2, Inc., I write with a status update as per the Court's February 22, 2021 Order. With regard to the matter *In re Andrew J. Delaney*, No. 1-20-44372 (Bankr. E.D.N.Y.), the Eastern District of New York Bankruptcy Court ("Bankruptcy Court") has not lifted the stay. On April 8, 2021, the Bankruptcy Court denied Mr. Delaney's motion to dismiss his bankruptcy case, which both the Trustee and HC2 Inc. opposed. Mr. Delaney has also filed a motion in the Bankruptcy Court seeking relief from the automatic stay for the purpose of permitting this Court to decide his motion to dismiss for lack of subject matter jurisdiction. HC2 understands Mr. Delaney has asked to adjourn that motion until June 15, 2021, but HC2's response to that motion is at present due May 5, 2021.

We will advise the Court if there are additional updates in regards to the automatic stay and thank the Court for its attention to this matter.

Respectfully Submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

*s/ Michael Nacchio*

Michael Nacchio

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